

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**STATE OF MISSISSIPPI *ex rel.*
JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI**

PLAINTIFF

V. CIVIL ACTION NO. 3:14-cv-52-HTW-LRA

**JPMORGAN CHASE & COMPANY;
CHASE BANK USA, N.A. and
CHASE BANKCARD SERVICES, INC.**

DEFENDANTS

RESPONSE TO PLAINTIFF'S MOTION FOR FEES AND COSTS

COME NOW Defendants JPMorgan Chase & Company, Chase Bank USA, N.A., and Chase BankCard Services, Inc. (collectively, "Chase") and files this their Response to Plaintiff's Motion for Fees and Costs, Docket No. 10, and in support thereof would show unto the Court the following, to-wit:

1. Chase's removal of this action to this Court was objectively reasonable. In its Complaint, Plaintiff expressly asserted violations of federal law and attempted to re-cast other alleged violations of other federal laws under the guise of state law. Thus, this Court has original jurisdiction over this matter and the removal was proper.

2. In support of the instant Response, Chase relies upon its Memorandum in Opposition to Plaintiff's Motion for Fees and Costs, being submitted simultaneously herewith.

WHEREFORE, PREMISES CONSIDERED, Chase prays that Plaintiff's Motion for Fees and Costs be denied. Chase further prays for general relief.

THIS the 13th day of March, 2014.

Respectfully submitted,

**JPMORGAN CHASE & COMPANY,
CHASE BANK USA, N.A. and CHASE
BANKCARD SERVICES, INC.**

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served via electronic filing and/or U.S. Mail, postage prepaid, a true and correct copy of the foregoing to:

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This the 13th day of March, 2014.

s/ Mark H. Tyson
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